

POSTAL REGULATORY COMMISSION
WASHINGTON , DC 20268-0001

COMMENT TO RESPONSE OF THE UNITED STATES
POSTAL SERVICE TO ORDER NO. 1366

Docket No. MC2012-26

Comments of Postal Solutions Inc.

The enhanced PO Box services currently being offered by the Post Office create a competitive product with an unfair competitive advantage. We are a small neighborhood business that along with other CMRA's that have had our sales impacted by the unfair competition by the USPS. The additional enhancements will further impact our sales as PO Box enhancements become fully implemented and general knowledge.

Postal Regulations require that The CMRA customer have their box number on all mail that they receive or the CMRA cannot deliver it to them. The Fact is that The USPS is systematically omitting the Box number on change of addresses because they fail to have the mail box series in their system. This results in not just forwarded mail not being delivered to the recipient, but also mail sent by companies that utilize the USPS Database to verify correction of addresses prior to mailing. The USPS systematically damages any CMRA customer that utilizes the # sign for receipt of mail.

The USPS has gone so far as to omit the # sign from the forwarding address form, only allowing the PMB. CMRA customers have found that even with the PMB prefix, their mail was not delivered. I have had customers go to the Post office multiple times because they never got their forwarding. The Post Office told our customers that they would not have these problems if they had a Post office box

A neighboring CMRA was closing and we worked out an arrangement that I would provide continued service for one dollar. Twenty-seven Postal Planet CMRA customers completed change of address forms. On the day that Postal Planet closed, the owner of Postal Planet took the forwarding address cards and gave them to a supervisor at the main Torrance Post Office. I later verified that that supervisor gave the forwarding cards to the Customer Service Supervisor.

Customers began complaining that they were not getting their mail. I referred them to the Post Office where they were advised that there mail was returned when Postal Planet Closed. They were directed to complete new forwarding address cards. Several of the people that were moving to my operation told me that if they had a mail box at the Post office this wouldn't happen that it occurred because they were dealing with a private postal service. As a result they closed their mail receiving service with Postal Solutions. Now mind you they were closing a box that only cost them a dollar due to the coercion by the Post Office that the problems were created by the CMRA and that with a Post Office Box, these problems would not occur.

Verification of the forwarding input with the box number and the box number omission can be verified in the Postal Forwarding system. In spite of everything being done correctly in accordance with Postal

Regulation, the Box number was omitted from Examples that the addresses that the mail was being forwarded from are:

Winwin Solutions Investment
P.O. Box 4244
Redondo Beach, CA 90278-8444

Jeff Burghart
21109 Reynolds Dr. Apt. M
Torrance, CA 90503-4261

Douglas Sam
703 Pier Ave. #B219
Hermosa Beach, CA 90254-3949

Please contact me for further clarification and supplemental information concerning the theft of customers as stated above.

The enhanced PO Box services currently being offered that I oppose include:

- Offering Post Office Box renters the use of the Post Office street address for Post Office Box addressing.
- Removing the PO Box designation when using a street address.
- Offering Post Office Box renters email notification of mail delivery.
- Offering Post Office Box renters the ability to receive packages from private carriers.

In reality, these enhancements allow the USPS to offer an identical service to Private Mail Box (PMB) Service. The CMRA regulations established by the USPS create an unfair advantage for the USPS in offering those services. Those unfair regulatory advantages include, but are not limited to:

- The requirement to handle mail for 6 months for departed or cancelled customers. As a store owner, I have to apply new postage to any item that is forwarded during this term.
- The inability for PMB customers to file a change of address form once their contract has ended with the CMRA.
- The inability for PMB customers to get the same free forwarding service offered to PO Box customers.

Additionally, the USPS has publicly expressed their desire to move from 6-day to 5-day delivery. The USPS has repeatedly stated that as their plan stands today, PO Box customers would continue to receive 6-day delivery while PMB customers would not. Should the Post Office to get approval of their desired 5-day delivery plan, they would gain yet another unfair advantage over PMB service.

It is unreasonable to ask small businesses like myself to compete with the Post Office when that entity gives itself regulatory advantages on competitive services and products. When the Post Office first sought

to move the PO Box service from the Market Dominant to Competitive category, no mention was made of adding any enhancements. These enhancements change the basic product, and when combined with the CMRA regulations, create a distinct and unfair competitive advantage for the USPS.

It should be clear by this time that the USPS has knowingly and systematically attempted to compete with Mail and Parcel Centers for almost 20 years by starting new profit centers without regulatory approval and then acting as though they were not aware that preapproval is necessary even when the USPS was provided notice many times in writing to obtain such approval. The USPS's disregard for the rules and regulation should alone be enough to deny any requests by them until they begin playing by the rules as the rest of us are required.

The continuation of these enhancements as stated above are clearly not in the interest of the small business CMRA/Mail and Parcel Center. It is clearly as shown above, not in the Public Interest.

I respectfully request that the Commission advise the Post Office to cease offering these PO Box enhancements as soon as possible.

Arnold Goldstein
President
Postal Solutions Inc.
August 7, 2011